

DOCUMENT PRODUCTION

The term "you," "yourself," and "your" shall refer to Brad Edwards, his spouse and each and any of his dependent children, each Trust of which any of the foregoing is trustee or holds some other controlling interest or beneficial interest, and any attorneys or agents who acted behalf on behalf of any of the foregoing.

The phrase "period in question" shall refer to January 2007 to present.

1. All financial statements, credit applications, lease applications, loan applications, financial affidavits and financial representations which at any time during the period in question were prepared for or submitted by you personally or on your behalf or on behalf of any entity in which you held an ownership interest of 5% or more at any time during the period in question.
2. ALL Forms W-2, Forms 1099 and any other documents reflecting any income (including salary, bonuses, profit distributions, and any other form of income), compensation, remuneration or revenue, including all gross and net revenue received by you directly or indirectly at any time during the period in question.
3. All tax returns, including, without limitation, federal, state, local or foreign tax returns and including, without limitation, all such returns relating to income, wealth, sales, use, personalty, VAT, gifts, withholding, foreign accounts, foreign assets, transfers, stamps, real estate transfers, payments to contractors, trusts, small business corporations, corporations, partnerships, limited liability company, and charitable organizations filed with any taxing entity during the period in question by you or on your behalf, or on behalf of any entity in which you hold or held a controlling interest at the time of filing. Include all schedules, worksheets and supporting documents relied upon, used or prepared in connection such returns.
4. All bank statements, brokerage statements, securities statements, money market account statements, commodities account statements, securities account statements, mutual fund statements, annuities statements, whole life insurance statements, financial account statements, financial institution statements, transaction statements, accounts receivable statements, loan statements, lease statements, credit card statements, revolving credit statements, accounts payable statements which were prepared by or received during the period in question by you, or on your behalf or by or on behalf of any entity in which you had an ownership interest of 5% or more at any time during the period in question. Include with such production all such statements with respect to ownership by you individually, jointly with any person or entity or as trustee, guardian or custodian.
5. All records pertaining to any and all transactions with respect to financial markets related matters, including, without limitation, acquisition, transfer, disposition, exchange

or other transactions in securities, bonds, options, currencies, commodities, swaps and other financial instruments, at any time during the period in question by you or on your behalf, or by or on behalf of any entity in which you held an ownership interest of 5% or more at the time the record was received, such records to include any and all information relative to gains or losses realized from such transactions.

6. The deeds and titles to all real property, whether residential or commercial and whether personal or for investment, owned by you or held on your behalf or by or on behalf of any entity in which you held an ownership interest of 5% or more at any time during the period in question.

7. Leases and Sub-Leases and Lease Agreements and Sub-Lease Agreements with respect to all real property, whether residential or commercial, leased or sub-leased at any time during the period in question directly or indirectly by you or on your behalf, or by or on behalf of any entity in which you held an ownership interest of 5% or more at any time during the period in question.

8. All passbooks with respect to savings accounts, checking accounts and savings and loan association share accounts owned by you or on which you hold a right or have a held a right to withdraw funds at any time during the period in question.

9. All passbooks with respect to all savings accounts, checking accounts and savings loan association share accounts, owned by you in whole or in part jointly as co-partner, or joint venture, in any business enterprise, or owned by an entity in which you have or have had a controlling interest at any time during the period in question.

10. All documents with respect to safety deposit boxes maintained during the period in question by you or on your behalf, or by or on behalf of any entity in which you held an ownership interest of 5% or more at any time during the period in question.

11. The most recent bank ledger sheets or other financial account ledger sheets (including, without limitation, brokerage accounts, securities accounts, commodities accounts, margin accounts, money market accounts, mutual fund accounts, annuities accounts, retirement accounts, financial instrument accounts) in your possession, or accessible by you on the internet, with respect to all such accounts in which you have a right to withdraw funds.

12. The most recent bank ledger sheets or other financial account ledger sheets (including, without limitation, brokerage accounts, securities accounts, commodities accounts, margin accounts, money market accounts, mutual fund accounts, annuities accounts, retirement accounts, financial instrument accounts) in your possession, or accessible by you on the internet, with respect to all such accounts owned by you solely, or jointly as co-partner, or joint venture, in any business enterprise, or owned by any entity to which you have a controlling interest.

13. All physical or electronic books of account reflecting transactions during the period in question, including, without limitation, checking accounts, annuities accounts, mutual funds accounts, and other financial accounts, for all accounts on which you were authorized to withdraw funds during the period in question.

14. All physical certificated securities (including, without limitation, stocks, bonds, options, stock rights, and other certificated securities) owned by you, directly or indirectly, and all bearer certificates in your possession or control.

15. The latest available balance sheets and other financial statements with respect to any and all business enterprises of whatever nature in which you possess any ownership interest of 5% or more, whether as member, partner, joint venturer, stockholder, or otherwise, and all balance sheets and other financial statements issued at any time during the period in question with respect to each such business enterprise which at the time of issuance you possessed any such 5% or more ownership interest.

16. As at the beginning of each fiscal year during the period in question, and as at the date of this request, the accounts receivable ledger, or other company records which set forth the names and addresses of all persons or business enterprises indebted and the amounts and terms of such indebtedness, with respect to accounts receivable of you and of any business enterprise in which as of such date you possessed any ownership interest of 5% or more, whether as member, partner, joint venturer, stockholder, or otherwise,.

17. The title certificates, registration certificates, bills of sale, and other evidences of ownership possessed by you or held for your beneficial interest or by any entity in which you held an ownership interest of 5% or more at any time during the period in question with respect to any of the following described property owned by you or held directly or indirectly for your beneficial interest (including fractional ownership) or by any entity in which you held an ownership interest of 5% or more at any time during the period in question:

- a. Motor vehicles of any type;
- b. Commercial, business or construction equipment of any type; and
- c. Boats, launches, cruisers, planes, or other vessels of any type.

18. All records pertaining to the sale, transfer, exchange or other disposition at any time during the period in question of any money or property interests or financial interests of any type, nature or description, whether for or without consideration, made by you or on your behalf, or by or on behalf of any entity in which you held an ownership interest of 5% or more at the time of such sale, transfer, exchange or other disposition.

19. Any and all memoranda and/or bills evidencing as of any date during the period in question, the amount and terms of all of the debts and obligations of you or of any entity in which you held an ownership interest of 5% or more as of such date.

20. All records indicating any and all income, compensation, remuneration, revenue, benefits and all other things with a fair market value of \$1,000 or more received from any and all sources at any time during the period in question directly or indirectly by you or any entity in which at the time of receipt you held an ownership interest of 5% or more.

21. All policies of insurance issued at any time during the period in question in which you or any entity in which at the time such policy was issued you held an ownership interest of 5% or more. Include policies for items of any nature or description, including, without limitation, homeowner's insurance, commercial property insurance, motor vehicle insurance, water craft insurance, aircraft insurance, insurance for personalty including without limitation precious and semi-precious stones, gold, silver, jewelry, watches, antiques, artwork, and other personalty, umbrella policies, premises liability insurance, professional liability policies, other business insurance policies, key man life insurance policies, personal life insurance policies (including term and whole life policies), and disability insurance policies.

22. Copies of all appraisals and valuations of any and all property and interests of any type, including, without limitation, commercial property, business assets, partnership interests, membership interests, equity interests, businesses, real property, personal property, intangible property, good will, intellectual property, illiquid assets, financial assets, motor vehicles, water craft, aircraft, precious and semi-precious stones, gold, silver, jewelry, watches, artwork, antiques, prepared at any time during the period in question by or on behalf of you or by or on behalf of any in which at the time of preparation you held an ownership interest of 5% or more.

23. Copies of any and all trust agreements, and all amendments, modifications and supplements thereto, in which at any time during the period in question you were the settlor or beneficiary, together with such documents necessary and sufficient to identify the nature and fair market value of the trust res as of the beginning of each fiscal year of the trust during which you were the settlor or beneficiary.

24. A copy of your current last will and testament and copies of any and all previous versions of your last will and testament prepared for you at any time during the period in question.

25. A copy of all documents that reflect, and all promises, instruments, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any business arrangements between you and any and all lawfirms through which you rendered legal services at any time during the period in question, including, without limitation, cost sharing, fee splitting, fee percentage, profit sharing and/or profit participation terms and conditions. Provide the same documents with respect to your provision of legal services during your affiliation with Rothstein Rosenfeldt and Adler.

26. A copy of all documents reflecting, and all instruments, agreements, contracts, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any and all trust arrangements, guardian arrangements, custodial arrangements or similar arrangements established by and/or for the benefit of each of LM, EW and Jane Doe in respect of the receipt, administration and/or payment or distribution of the proceeds of settlement of claims by LM, EW or Jane Doe against Jeffrey Epstein.

27. A copy of all documents reflecting, and all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any and all arrangements that you and/or your lawfirm and/or any other lawyer and/or lawfirm have or at any time during the period in question had with LM, EW or Jane Doe which in any way relates to allegations by LM, EW or Jane Doe against Jeffrey Epstein, including without limitation engagement letters, retainer letters, fee sharing arrangements, common interest or joint defense agreements, royalty agreements, publishing agreements, literary rights agreements, any other agreements relating to media rights, film rights, television rights, publishing rights, book rights, photograph rights, story rights, agency, or similar matters relating to allegations concerning Jeffrey Epstein.

28. A copy of all documents reflecting, and all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any and all arrangements that you, any lawfirm through which you have provided legal services, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL and/or any other lawyer and/or lawfirm have or at any time during the period in question had with any and all attorneys, investigators, other professionals, contractors and consultants and witnesses with respect to this case, [the CVRA case], and the claims of each of LM, EW and Jane Doe against Jeffrey Epstein, including without limitation engagement letters, retainer letters, fee sharing arrangements, common interest or joint defense agreements, royalty agreements, publishing agreements, literary rights agreements, any other agreements relating to media rights, film rights, television rights, publishing rights, book rights, photograph rights, story rights, agency, or similar matters relating to allegations concerning Jeffrey Epstein.

29. A copy of all documents reflecting, and all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any and all arrangements that Paul Cassell, Jack Scarola, Searcy Denney Scarola Barnhart & Shipley PA, or Boies Schiller Flexner LLP have or at any time during the period in question had with any and all attorneys (including, without limitation, you, any lawfirm through

which you then rendered legal services, and Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrnma PL), investigators, other professionals, contractors and consultants and witnesses with respect to this case, [the CVRA case], and the claims of each of LM, EW and Jane Doe against Jeffrey Epstein, including without limitation engagement letters, retainer letters, fee sharing arrangements, common interest or joint defense agreements, royalty agreements, publishing agreements, literary rights agreements, any other agreements relating to media rights, film rights, television rights, publishing rights, book rights, photograph rights, story rights, agency, or similar matters relating to allegations concerning Jeffrey Epstein.

30. A copy of all documents, including, without limitation, checks, wire transfer instructions, wire transfer confirmations, bank statements, email confirmations, Notices of Distribution and other documents, reflecting any and all payments or distributions made by you, any lawfirm through which you provided legal services and/or Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL in respect of the proceeds of settlement paid by Jeffrey Epstein in connection with the claims of LM, EW and Jane Doe against Jeffrey Epstein, including, without limitation, payments or distributions made to or for the benefit of LM, EW or Jane Doe (including, without limitation, to any trusts or similar arrangements or accounts of which any of LM, EW or Jane Doe were then beneficiaries), payments made to Paul Cassell, payments made to any other lawfirm or individual lawyer, payments made to investigators, consultants, advisors, or other professionals, payments made to other contractors and payments made to witnesses.

31. A copy of all documents, including, without limitation, checks, wire transfer instructions, wire transfer confirmations, bank statements, email confirmations, Notices of Distribution and other documents, reflecting in respect of the proceeds of settlement paid by Jeffrey Epstein in connection with the claims of LM, EW and Jane Doe against him any and all amounts retained by or allocated to you, any lawfirm through which you then provided legal services, and/or Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL as reimbursement of costs and expenses or in payment for legal services rendered.